

FILED

SEP 17 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
SUPPRESSED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

JOHN S. LANGE,

Defendant.

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) No.
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4:20CR00560 AGF/SRW

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

- (a) “minor” to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) “sexually explicit conduct” to mean actual or simulated
 - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.

§ 2256(2)(A)); and

(c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

(d) “child pornography” to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(B) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about February 15, 2019, and December 26, 2019, in the Eastern District of Missouri, and elsewhere,

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the Defendant herein, did knowingly receive material that contained image files of child pornography using any means and facility of interstate and foreign commerce, to wit the Defendant knowingly distributed and/or received image files of child pornography via the internet, to include but not limited to the following:

a. an image entitled “1_0_15772316181” depicting a female minor who appears to be

under the age of five years with her mouth on an adult penis;

b. an image entitled "1_5_15772315121" depicting a female minor who appears to be under the age of ten years being vaginally penetrated by an adult penis; and

c. an image entitled "2fd9c32f2dfbf2cbc917fb8d9d43b571 depicting a female minor who appears to be under the age of five years with her hand on an adult penis,

in violation of 18 U.S.C. § 2252A(a)(2).

A TRUE BILL.

FOREPERSON

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